

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

JOANN INC.,<sup>1</sup>

Post-Effective Date Debtor.

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Chapter 11

Case No. 25-10068 (CTG)

**CERTIFICATION OF COUNSEL REGARDING APPROVAL  
OF JOINT STIPULATION REGARDING CLAIMS OF NNN REIT, LP**

Ann Aber, solely in her capacity as the Plan Administrator (the “Plan Administrator”) appointed in the above-captioned case, and NNN REIT, LP (the “Landlord” and together with the Plan Administrator, collectively, the “Parties”), entered into a stipulation and hereby certify as follows:

1. The Landlord’s lease for non-residential real property located in Corpus Christi, Texas was rejected effective May 31, 2025.

2. On July 21, 2025, the Landlord filed a Proof of Claim designated as Claim No. 19525. Claim No. 19525 asserts claims totaling \$438,442.61, including administrative expense claims totaling \$35,670.27 and unsecured claims totaling \$402,772.34.

3. On December 3, 2025, the Plan Administrator filed its *Seventeenth (Substantive) Omnibus Objection to Certain Claims (Unliquidated Claims and Overstated Claims)* [Docket No. 1860] (the “Overstated Objection”).

4. As of the date of filing of the Overstated Objection, the administrative portion of Claim No. 19525 had not been paid. The Landlord reached out to the Plan Administrator to

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<sup>1</sup> The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

informally resolve the Overstated Objection and thereafter provided appropriate documentation, at the request of the Plan Administrator.

5. On December 31, 2025, the Plan Administrator paid the administrative portion of Claim No. 19535 in the amount of \$35,670.27 via ACH.

6. The Plan Administrator and Landlord hereby agree to resolve the administrative claims set forth in Claim No. 19535 by the allowance and satisfaction of \$35,670.27 as an administrative expense claim. Accordingly, the administrative expense claims set forth in Claim No. 19525 shall be deemed satisfied and resolved.

7. This Stipulation resolves the Overstated Objection solely as to the administrative portion of Claim No. 19525. The Parties stipulate and agree that the Plan Administrator may prepare and submit an order in respect of the Overstated Objection that is consistent with this Stipulation.

8. Nothing contained herein constitutes the allowance of any unsecured claim of Landlord nor shall the Landlord waive any rights or defenses with respect to the unsecured portion of Claim No. 19525 or any other claims filed by the Landlord against the estate that have not yet been resolved.

9. A proposed order approving the Stipulation is attached hereto as **Exhibit A** (the “**Proposed Order**”).

10. A copy of the Stipulation is attached as **Exhibit 1** to the Proposed Order.

11. Accordingly, the Parties request entry of the Proposed Order attached hereto as **Exhibit A** at the Court’s earliest convenience.

*[Remainder of Page Intentionally Left Blank]*

Dated: January 9, 2026  
Wilmington, Delaware

/s/ Patrick J. Reilley

**COLE SCHOTZ P.C.**

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- and -

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